

EXHIBIT B

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

In re TWITTER, INC. SECURITIES
 LITIGATION

Case No. 4:16-cv-05314-JST (SK)
 (Consolidated with 4:16-cv-05439-JST)

This Document Relates to:
 ALL ACTIONS

CLASS ACTION

**DECLARATION OF RICHARD COSTOLO
 CERTIFYING RECORDS PURSUANT TO
 FEDERAL RULES OF EVIDENCE 803(6) AND
 902(11)**

1 I, Richard Costolo, hereby declare:

2 1. I served as Chief Executive Officer of Twitter, Inc. from 2010 to 2015. I have personal
3 knowledge of all facts stated in this declaration and would testify competently thereto if called upon
4 as a witness.

5 2. As described in detail herein, the trial exhibits referred to in this Declaration constitute
6 writings maintained, taken, or made in the regular or ordinary course of business of Twitter at or near
7 the time of the act, condition, event, or opinion to which they relate by—or from information
8 transmitted by—persons employed by Twitter who had (1) knowledge of the act, condition, event, or
9 opinion; and (2) a business duty to Twitter to accurately and completely take, make, and maintain such
10 records and documents in the regular practice of the regularly-conducted activities required by their
11 positions.

12 3. Trial Exhibit¹ 2739 is an email exchange dated January 21, 2015 between me and
13 Christian Oestlien regarding growth metrics for January 20, 2015. Mr. Oestlien and I exchanged this
14 correspondence as part of our regularly-conducted practice of monitoring, reporting on, and analyzing
15 metrics like those reflected in the email. The metrics included in the email were prepared by Twitter
16 employees with personal knowledge of their contents at or near the time those metrics were calculated,
17 and also as part of this regular practice.

18 4. Trial Exhibit 2770 is an email dated March 4, 2015 that Peter Currie, the lead
19 independent director on Twitter's Board of Directors, sent to me and Vijaya Gadde in response to an
20 email from me expressing my intention to resign as Chief Executive Officer, at or near the time of my
21 decision to do so. Mr. Currie and I exchanged these emails as part of our regular practice of
22 corresponding about issues affecting Twitter's senior management, including the appointment and
23 resignations of its officers. Such correspondence was in connection with our regularly-conducted
24 activities in our roles as independent director on the Board of Directors and CEO at Twitter,
25 respectively, which required us to engage with matters involving management and corporate strategy,
26 like those involved in this exhibit.

27 _____
28 ¹ All references to Trial Exhibits correspond to the exhibit numbers in Defendants' operative trial
exhibit list, ECF No. 594-4, filed June 30, 2021.

5. Trial Exhibit 2810 is an email dated May 4, 2015 that I sent to the Twitter Board of Directors to update them on issues regarding Twitter's strategy and performance. I sent this email to the Board based on my personal knowledge of the subject matter therein, at or near the time of the events it discusses, and as a regular practice of my regularly-conducted activity of providing the Board with information about the Company's strategy and performance.

6. Trial Exhibit 3186 is a letter from the Securities and Exchange Commission addressed to Twitter regarding Twitter's Amendment No. 2 to its Draft Registration Statement on Form S-1 submitted on September 9, 2013. Twitter maintained this letter at or near the time it was sent as a regular practice of its regularly-conducted activity of corresponding with the SEC in connection with its legally-mandated filings submitted in connection with its initial public offering.

7. Trial exhibit 3187 is a letter to the Securities and Exchange Commission from the law firm of Wilson, Sonsini, Goodrich and Rosati on behalf of Twitter regarding Twitter's Amendment No. 2 to its Draft Registration Statement on Form S-1 submitted on September 9, 2013. Twitter agents and employees with personal knowledge of the Company's Form S-1 prepared and submitted this letter at or near the time of the events described therein as a regular practice of the Company's regularly-conducted activity of corresponding with the SEC regarding its legally-mandated filings in connection with its initial public offering.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 10, 2021 in Corte Madera, California.

/s/ 
Richard Costolo